

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
v.)
) Criminal No. 11-10212-JLT
)
1. JOHN WILLIS)
2. BRANT WELTY)
3. PETER MELENDEZ)
4. AIBUN ENG)
5. BRIAN BOWES)
6. KEVIN BARANOWSKI)
7. MICHAEL CLEMENTE)
12. BRIDGET WELTY)
14. COLBY DEERING)
15. ANH NGUYEN)
)
 Defendants.)

DECLARATION OF PUBLICATION

Pursuant to Rule 32.2(b)(6)(C) of the Federal Rules of Criminal Procedure, which authorizes the manner of publication of an Order of Forfeiture in a criminal case, notice of the forfeiture was posted on an official government internet site (www.forfeiture.gov) for at least 30 consecutive days, beginning on June 20, 2013 and ending on July 19, 2013. *See Attachment 1.*

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief. Executed on July 26, 2013 at Boston, Massachusetts.

/s/ Richard L. Hoffman
RICHARD L. HOFFMAN
Assistant United States Attorney
U.S. Attorney's Office
1 Courthouse Way, Suite 9200
Boston, MA 02210
(617) 748-3100

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the Electronic Court Filing system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Richard L. Hoffman

RICHARD L. HOFFMAN

Assistant United States Attorney

Dated: July 26, 2013

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
COURT CASE NUMBER: CR 11-10212-JLT; NOTICE OF FORFEITURE**

Notice is hereby given that on June 05, 2013, in the case of U.S. v. John Willis, et al., Court Case Number CR 11-10212-JLT, the United States District Court for the District of Massachusetts entered an Order condemning and forfeiting the following property to the United States of America:

Approximately \$98,473.00 in United States currency, seized by the Ridgeland, South Carolina, Police Department from Michael Shaw and Defendant JOHN WILLIS (who falsely identified himself to police as Defendant BRANT WELTY) on or about February 10, 2011, on Route 95 in Ridgeland, South Carolina, turned over to the Drug Enforcement Administration for federal forfeiture, numbered for tracking purposes as Asset No. 11-DEA-543937, and claimed on or about April 20, 2011, by Michael Shaw via a false sworn statement submitted by Shaw to DEA Forfeiture Counsel;

Approximately \$42,940.00 in United States currency, seized by the Dillon, South Carolina, Police Department from Defendant JOHN WILLIS (who falsely identified himself to police as Defendant BRANT WELTY) and Defendant BRANT WELTY, on or about March 24, 2011, on Route 95 in Dillon, South Carolina, turned over to the Drug Enforcement Administration for federal forfeiture, numbered for tracking purposes as Asset No. 11-DEA-545304, and claimed on or about May 25, 2011, by Defendant BRANT WELTY via a sworn statement submitted by Defendant BRANT WELTY to DEA Forfeiture Counsel);

Yamaha Jet Ski, Florida Registration No. MS9286AW, VIN or S/N YAMA2946A606, seized on or about May 27, 2011, from the 2490 NE 23rd Court, Pompano Beach, Florida, home rented for Defendant JOHN WILLIS in the name of co-conspirator Peter Melendez (hereafter, the "Pompano Beach home") and identified for tracking purposes as Asset ID No. 11-FBI-3912;

The inventory of wine and liquor seized from the 1750-1752 Washington Street, Boston, Massachusetts, premises of Cru Wine & Spirits, Inc., on or about May 27, 2011, which has been identified for forfeiture purposes as Asset No. 11-FBI-003952, and which is more fully described in Exhibit A attached to the Preliminary Order of Forfeiture entered in this case on June 5, 2013, Docket No. 736;

Various pieces of jewelry seized on or about May 27, 2011, from the Dorchester apartment occupied by Defendants JOHN WILLIS and ANH NGUYEN, collectively identified for tracking purposes as included in Asset ID No. 11-FBI-004487 (which also includes other items which are not being forfeited):

- (1) Rhodium plated 14KYG ring set - 10 princess cut & 16 marquise cut diamonds (also described as 14 kt. White gold ring mounting with 14kt. Yellow gold center holding .05 princess cut diamonds);
- (2) Stainless steel gent's watch Aeromarine Super Avenger watch w/Breitling movement (also described as Breitling stainless steel watch with 129 diamonds equaling 2.58 ct. and 351 diamonds equaling

3 ct.);

(3) Rhodium plated 14KRG bracelet with 264 princess cut and 94 rd diamonds (also described as 14kt. White gold and diamond bracelet with a total of 22.70 ct.);

(4) Gents 14KWG ring with 84 princess cut and channel set with 36 rbc diamonds (also described as 14kt. Gold ring holding 84 princess cut diamonds each .04 ct.);

(5) Stainless steel lady's [possibly counterfeit] Tag Heuer Aquaracer quartz watch (also described as Stainless steel Tag Heuer watch with 1/2 pt. diamond markers and 42 full cut diamonds 1 and 1/2 pt. each); and

(6) Stainless steel Rolex Oyster Perpetual Datejust watch w/12 round cut diamonds (also described as Rolex watch with 12 single cut round diamonds .01 pts. each);

Black 2005 American IronHorse Motorcycle, Massachusetts Registration No. 9X6771, VIN 5L5SJ144X51000005, identified for tracking purposes as Asset ID No. 11-FBI-004519;

The Retail Package Store All Alcoholic Beverages License issued by the Commonwealth of Massachusetts Alcoholic Beverages Control Commission to Cru Wine & Spirits, Inc., 1750-1752 Washington Street, Boston, Massachusetts, and all rights appertaining thereto, to the extent that such rights are forfeitable to the United States and transferable to another person by the United States pursuant to applicable federal, state, and local law and regulations, including, but not limited to, the physical license document which has been identified for forfeiture purposes as Asset Nos. 11-FBI-004540;

The following watches and jewelry seized on May 27, 2011, from the Wormwood Street, Dorchester, apartment occupied by Defendants BRANT WELTY and BRIDGET WELTY, and collectively identified for tracking purposes as Asset ID No. 11-FBI-004758:

(1) Men's gold-tone Movado watch;

(2) Men's 14k yellow gold overlay stainless steel Omega watch, Constellation model;

(3) Men's stainless steel Baume & Mercier watch, Copeland Sport model 65366, s/n 5270762;

(4) Men's stainless steel Tag Heuer watch with 11 single-cut diamond dot markers, model WJ 1114-0, s/n YP7640;

(5) Men's stainless steel Tag Heuer watch, model CT1110, s/n MZ9436;

(6) Men's stainless steel & 18k yellow gold 8" bracelet; and

(7) Ladies' 18k yellow gold cluster ring, with 10 full-cut diamonds and 1 dark blue sapphire;

The following firearms, ammunition, and accessories seized on May 27, 2011, from the Wormwood Street, Dorchester, apartment occupied by Defendants BRANT WELTY and BRIDGET WELTY:

(1) Colt Diamondback .38 caliber revolver, s/n D 19274, determined to be untraceable by the ATF National Tracing Center;

(2) Glock Model 19, 9 mm. pistol, s/n TE664US, with magazine and 13 rounds of ammunition;

- (3) Interarms Walther PPKIS .380 caliber pistol, s/n 5076186;
- (4) LW Seecamp California Edition .32 caliber pistol, s/n 046642, with 6 round magazine;
- (5) Sig Sauer Model SP2340 pistol, sin SP0012952, with 2 magazines containing 10 rounds each;
- (6) Smith & Wesson Model640, .38 caliber revolver, s/n CEN4731;
- (7) Smith & Wesson Model 27, .357 caliber revolver, s/n N164836, reported stolen on about May 25,2010, during a house break-in in Chester, Vermont;
- (8) Smith & Wesson Model 66, .357 caliber revolver, s/n 6K82887;
- (9) Smith & Wesson SW40VE .40 caliber handgun, s/n RBT4168, with 2 magazines containing 10 rounds each, reported stolen on about October 19, 2010, from a residence in Stoneham, Massachusetts;
- (10) Remington Model 870 12-gauge Shotgun, s/n A 740380M;
- (11) DPMS Panther Arms A-15 Model rifle, s/n N0005955, with one magazine;
- (12) Uzi Model B 9 mm. rifle, s/n 65661, with 4 magazines, bag, and barrel;
- (13) 75 rounds of .32 caliber ammunition;
- (14) 2 boxes of Wolfbrand .223 caliber rounds, totaling 40 rounds;
- (15) 270 rounds of .38 caliber ammunition;
- (16) 63 rounds of .357 caliber ammunition;
- (17) 4 rounds of .40 caliber ammunition;
- (18) 93 rounds of .40 caliber ammunition;
- (19) 80 rounds of .380 caliber ammunition; and
- (20) 138 Rounds of 9 mm. ammunition;

The white 2000 Honda Odyssey, Massachusetts Registration No. NI9060, VIN 2HKRL1866YH590541, seized from Aibun Eng on about May 27, 2011;

US Armor body armor, s/n BA-US-61797003, reported stolen from a federal agent in Boston, and seized on May 27, 2011, from the Wormwood Street, Dorchester, apartment occupied by Defendants BRANT WELTY and BRIDGET WELTY;

Seized Items Nos. 1B13 and 1B14 (seized on May 27, 2011, from defendant Brian Bowes incident to his arrest in Florida): Glock Semi-Auto 9 mm. Handgun Model 26, SIN: KPE731, a firearms magazine with 8 rounds of .40 caliber ammunition, and 9 rounds of 9 mm. ammunition;

Seized Item No. IB94 (seized on May 27, 2011, during the search of the Park Street, Dorchester, apartment occupied by John Willis and Anh Nguyen): Various watches and jewelry including:

- (1) One man's black and silver Invicta 1959 Diver watch with inscription on the back: "Between the devil and the deep blue sea come hell or high water";
- (2) One man's black strapped with diamond face "Hublot" watch with inscription on the back "BigBang" and the number "301RX";
- (3) One man's Jacob and Co. watch with black strap and diamond face, which shows time for multiple time zones);
- (4) One man's Breitling silver strap watch with black face;
- (5) One woman's Skagen watch with silver strap and silver face;

(6) One man's silver colored bracelet (looks like bicycle chain);

and

(7) One man's silver colored necklace (looks like bicycle chain);

Seized Items Nos. 1B68 and 1B69 (seized on May 27, 2011, from the Pompano Beach home): Sig Sauer P226 .40 caliber pistol, S/N: UU613193 and two (2) Sig Sauer .40 caliber magazines with 24 Rounds of ammunition;

Seized Items Nos. 1B72, 1 B73, 1B75, and 1B78 (seized on May 27, 2011, from the Pompano Beach home): a total of approximately \$2,026.00 in U.S. Currency (comprising Items 1B72 (\$25.00), 1B73 (\$1200.00), 1B75 (\$254.00), and IB78 (\$547.00);

Seized Item IB118 (seized on May 27, 2011, from the Wormwood Street apartment occupied by Brant Welty and Bridget Welty): \$500 in U.S. Currency;

Unnumbered item seized on May 27, 2011, from the Wormwood Street apartment occupied by Brant Welty and Bridget Welty: 31-round 9 mm. magazine with one (1) round of 9 mm. ammunition; and

A total of approximately \$979.25 in U.S. Currency, comprising seized Items IB154, 1855, 1B56, 18157, and IB396, seized on May 27, 2011, from the premises of Cru Wine & Spirits, Inc.

The United States hereby gives notice of its intent to dispose of the forfeited property in such manner as the United States Attorney General may direct. Any person, other than the defendant(s) in this case, claiming interest in the forfeited property must file a Petition within 60 days of the first date of publication (June 20, 2013) of this Notice on this official government internet web site, pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure and 21 U.S.C. § 853(n)(1). The petition must be filed with the Clerk of the Court, 1 Courthouse Way, Suite 2300, Boston, MA 02210, and a copy served upon Assistant United States Attorney Richard L. Hoffman, 1 Courthouse Way, Suite 9200, Boston, MA 02210. The petition shall be signed by the petitioner under penalty of perjury and shall set forth the nature and extent of the petitioner's right, title or interest in the forfeited property, the time and circumstances of the petitioner's acquisition of the right, title and interest in the forfeited property and any additional facts supporting the petitioner's claim and the relief sought, pursuant to 21 U.S.C. § 853(n).

Following the Court's disposition of all petitions filed, or if no such petitions are filed, following the expiration of the period specified above for the filing of such petitions, the United States shall have clear title to the property and may warrant good title to any subsequent purchaser or transferee.



Advertisement Certification Report

The Notice of Publication was available on the www.forfeiture.gov web site for at least 18 hours per day between June 20, 2013 and July 19, 2013. Below is a summary report that identifies the uptime for each day within the publication period and reports the results of the web monitoring system's daily check that verifies that the advertisement was available each day.

U.S. v. John Willis, et al

Court Case No: CR 11-10212-JLT
For Asset ID(s): See Attached Advertisement Copy

Consecutive Calendar Day Count	Date Advertisement Appeared on the Web Site	Total Hours Web Site was Available during Calendar Day	Verification that Advertisement existed on Web Site
1	06/20/2013	24.0	Verified
2	06/21/2013	24.0	Verified
3	06/22/2013	24.0	Verified
4	06/23/2013	24.0	Verified
5	06/24/2013	24.0	Verified
6	06/25/2013	24.0	Verified
7	06/26/2013	24.0	Verified
8	06/27/2013	24.0	Verified
9	06/28/2013	24.0	Verified
10	06/29/2013	24.0	Verified
11	06/30/2013	24.0	Verified
12	07/01/2013	24.0	Verified
13	07/02/2013	24.0	Verified
14	07/03/2013	24.0	Verified
15	07/04/2013	24.0	Verified
16	07/05/2013	24.0	Verified
17	07/06/2013	24.0	Verified
18	07/07/2013	24.0	Verified
19	07/08/2013	24.0	Verified
20	07/09/2013	24.0	Verified
21	07/10/2013	23.4	Verified
22	07/11/2013	24.0	Verified
23	07/12/2013	24.0	Verified
24	07/13/2013	24.0	Verified
25	07/14/2013	24.0	Verified
26	07/15/2013	23.9	Verified
27	07/16/2013	23.8	Verified
28	07/17/2013	24.0	Verified
29	07/18/2013	24.0	Verified
30	07/19/2013	24.0	Verified

Additional log information is available and kept in the archives for 15 years after the asset has been disposed.